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Administrator of the Liquidating Trust

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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In re

Chapter 11

ROCK & REPUBLIC ENTERPRISES, INC., et al.,

Case No. 10-11728 (AJG)
(Jointly Administered)

Debtors.

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NOTICE OF APPEARANCE AND DEMAND FOR SERVICE OF PAPERS

PLEASE TAKE NOTICE, that Todtman, Nachamie, Spizz & Johns, P.C. hereby appears in the above-captioned case as counsel for David K. Gottlieb, Liquidating Trust Administrator (the "Liquidating Trust Administrator") of the Liquidating Trust established under the confirmed Plan in the above-captioned case, and enters its appearance pursuant to section 1109(b) of title 11 of the United States Code (the "Bankruptcy Code") and Rules 2002, 3017, 9007 and 9010(b) of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules") and hereby requests that copies of all notices and pleadings given or filed in the above-captioned case be given and served upon the persons listed below at the following addresses, telephone and facsimile numbers, and e-mail addresses:

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Attention: Alex Spizz, Esq.
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PLEASE TAKE FURTHER NOTICE that pursuant to Section 1109(b) of the Bankruptcy Code, the foregoing demand includes not only the notices and papers referred to in the Bankruptcy Rules specified above but also includes, without limitation, all orders, notices, hearing dates, applications, motions, including motions to expunge and/or reduce claims, requests, complaints, demands, replies and answers, whether transmitted or conveyed by mail, e-mail, hand delivery, overnight carrier, courier service, telegraph, telex, telefax or otherwise, that affect the above-captioned case or the proceedings therein.

PLEASE TAKE FURTHER NOTICE, that the undersigned intends that neither this Notice of Appearance and Demand for Service of Papers nor any later appearance, pleadings, claim or suit shall be deemed or construed to be a waiver of the rights of the Liquidating Trust Administrator: (1) to have final orders in noncore matters entered only after *de novo* review by a District Judge; (2) to a trial by jury in any proceeding so triable in this case or any case, controversy, or proceeding related to this case; (3) to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal; or (4) or any other rights, claims, actions, setoffs, or recoupments to which the Liquidating Trust Administrator is or may be entitled, in law or in equity, all of which

rights, claims, actions, defenses, setoffs and recoupments the Liquidating Trust Administrator expressly reserves.

Dated: New York, New York
April 4, 2011

TODTMAN, NACHAMIE, SPIZZ
& JOHNS, P.C.
Attorneys for David K. Gottlieb, Liquidating
Trust Administrator of the Liquidating Trust

By: s/ Arthur Goldstein
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